

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

CHAUNCEY GIRARD,

9:22-CV-0339

Plaintiff,

AJB/TWD

-against-

ST. LOUIS, et al,

Defendants.

JURY VERDICT FORM

PLEASE NOTE: Each Juror will be provided with a Verdict Form. However, your verdict should be reported to the Judge on **ONLY ONE** Verdict Form which is signed by the Jury Foreperson (Foreperson). The remaining Verdict Forms should be returned to the Courtroom Deputy unsigned.

Please carefully follow the directions accompanying each question (including any directions or guidance in **bold type**). Also, please indicate your response to questions by placing an “X” on the appropriate lines.

QUESTION 1:

Do you find that Plaintiff has proven by a preponderance of the evidence that any Defendant listed below subjected Plaintiff to excessive force in violation of the Eighth Amendment of the U.S. Constitution?

Joseph St. Louis

YES ____

NO ____

Alan Gonyea

YES ____

NO ____

Edward Hoit

YES ____

NO ____

If you answered “No” with respect to all Defendants in Question 1, the proceed to Question 6. If you answered “Yes” with respect to any Defendants, then proceed to Question 2.

QUESTION 2:

Has Plaintiff proven by a preponderance of the evidence that Defendants' conduct proximately caused an injury to him? [Only answer for the Defendants that you answered "YES" to in response to Question 1].

| | | |
|------------------|----------|---------|
| Joseph St. Louis | YES ____ | NO ____ |
| Alan Gonyea | YES ____ | NO ____ |
| Edward Hoit | YES ____ | NO ____ |

If you answered "No" with respect to all Defendants in Question 2, then proceed to Question 6. If you answered "Yes" with respect to any Defendants, then proceed to Question 3.

QUESTION 3:

What amount, if any, of compensatory damages is Plaintiff entitled to as a result of the conduct of the Defendant(s) you have decided violated his rights under the Constitution and proximately caused injury to him?

\$ _____

You may not award both compensatory and nominal damages. If you found in Question 3 that Plaintiff was entitled to compensatory damages, please skip Question 4 and proceed to Question 6. If you instead found that Plaintiff was *not* entitled to compensatory damages, please proceed to Question 4, which concerns nominal damages of no more than \$1.00, and then proceed to question 5.

QUESTION 4:

What amount, if any, of nominal damages is Plaintiff entitled to as a result of the conduct of the Defendant(s) you have decided violated his rights under the Constitution and proximately caused injury to him?

\$ _____

Proceed to Question 5.

QUESTION 5:

Do you find that it is appropriate to award punitive damages against any of the Defendants with relation to the excessive force claim?

Joseph St. Louis YES ____ NO ____

Alan Gonyea YES ____ NO ____

Edward Hoit YES ____ NO ____

If you answered “Yes” with respect to any of the Defendants listed above, then you need not determine the amount of punitive damages to award at this time and can proceed to Question 6.

QUESTION 6:

Do you find that Plaintiff has proven by a preponderance of the evidence that any Defendant failed to intervene to protect Plaintiff in violation of the Eighth Amendment to the U.S. Constitution?

Joseph St. Louis YES ____ NO ____

Alan Gonyea YES ____ NO ____

Edward Hoit YES ____ NO ____

If you answered “No” with respect to all Defendants, then the Foreperson should sign and date this form and notify the Marshall that a unanimous verdict has been reached. If you answered “Yes” with respect to any of the Defendants, then proceed to Question 7.

QUESTION 7:

If in response to Question 6 you found that any of the Defendants failed to intervene to protect Plaintiff, has Plaintiff proven by a preponderance of the evidence that this violation proximately caused an injury to Plaintiff?

Joseph St. Louis YES ____ NO ____

Alan Gonyea YES ____ NO ____

Edward Hoit YES ____ NO ____

If you answered “No” with respect to all Defendants in Question 7, then the Foreperson should sign and date this form and notify the Marshall that a unanimous verdict has been reached. If you answered “Yes” with respect to any Defendants, then proceed to Question 8.

QUESTION 8:

What amount, if any, of compensatory damages is Plaintiff entitled to as a result of the conduct of the Defendant(s) you have decided violated his rights under the Constitution and proximately caused injury to him?

\$ _____

You may not award both compensatory and nominal damages. If you found in Question 8 that Plaintiff was entitled to compensatory damages, please skip Question 9 and proceed to Question 10. If you instead found that Plaintiff was *not* entitled to compensatory damages, please proceed to Question 9, which concerns nominal damages of no more than \$1.00, and then proceed to question 10.

QUESTION 9:

What amount, if any, of nominal damages is Plaintiff entitled to as a result of the conduct of the Defendant(s) you have decided violated his rights under the Constitution and proximately caused injury to him?

\$ _____

| | | |
|------------------|----------|---------|
| Joseph St. Louis | YES ____ | NO ____ |
| Alan Gonyea | YES ____ | NO ____ |
| Edward Hoit | YES ____ | NO ____ |

Proceed to Question 10.

QUESTION 10:

Do you find that it is appropriate to award punitive damages against any of the Defendants with relation to the failure to intervene claim?

| | | |
|------------------|----------|---------|
| Joseph St. Louis | YES ____ | NO ____ |
| Alan Gonyea | YES ____ | NO ____ |
| Edward Hoit | YES ____ | NO ____ |

YOUR DELIBERATIONS ARE COMPLETE. PLEASE INFORM THE MARSHAL THAT YOU HAVE REACHED A VERDICT. PLEASE REMEMBER TO HAVE THE FOREPERSON DATE AND SIGN YOUR VERDICT SHEET. THANK YOU.

Dated: July ____, 2025

Foreperson's Signature

Dated: Albany, New York
July 7, 2025

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To: All Attorneys of Record via ECF